

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

STAMBAUGH'S AIR SERVICE, INC.,	:	
Plaintiff,	:	CASE NO. 1:00-CV-0660
v.	:	
	:	
SUSQUEHANNA AREA REGIONAL AIRPORT AUTHORITY, BAA HARRISBURG, INC., DAVID FLEET, individually, DAVID HOLDSWORTH, individually, and DAVID C. McINTOSH, individually,	:	Chief Judge Yvette Kane
	:	
Defendants.	:	Magistrate Judge Smyser
	:	
	:	
	:	
	:	

**MOTION FOR PARTIAL RECONSIDERATION FOR
EXTENSION OF DISPOSITIVE MOTIONS DEADLINE**

NOW COME Defendants, the Susquehanna Area Regional Airport Authority, BAA Harrisburg, Inc., David Fleet, David Holdsworth, and David C. McIntosh, by and through counsel, Rhoads & Sinon LLP, and file the within Motion for Partial Reconsideration for Extension of Dispositive Motion Deadline, in support whereof Defendants aver as follows:

1. On June 8, 2007, this Honorable Court denied Defendants' Motions for Extension of Fact Discovery and Dispositive Motions Deadlines.

2. The Amended Case Management Order issued by this Honorable Court on April 2, 2006 set the fact-discovery deadline for June 30, 2007.

3. Defendants are prepared to comply with the June 30, 2007 fact-discovery deadline.

4. Defendants will depose Plaintiff's three key witnesses during the weeks of June 18 and June 25, 2007.

5. Because Defendants are deposing two key witnesses during the last week of June, it will be impossible to obtain transcripts of these depositions in time for filing dispositive motions on the same day that fact discovery closes.

6. Accordingly, Defendants request that this deadline be extended to July 9, 2007.

7. The transcripts will be obtained on an expedited basis.

8. However, the June 30, 2007 deadline does not provide adequate time for delivery and review of the transcripts, even if done on an expedited basis.

9. The deposition transcripts are necessary in order for Defendants to file a Motion for Summary Judgment.

10. Accordingly, Defendants are requesting reconsideration of the Court's denial of a request for extension of time only as it pertains to dispositive motions.

11. Defendants are not seeking an extension of any other deadlines in the case, and Defendants do not believe that the requested extension should affect the trial calendar.

WHEREFORE, Defendants respectfully request that this Honorable Court grant the above Motion for Partial Reconsideration for Extension of Dispositive Motions Deadline, as set forth in the attached proposed Order.

Respectfully submitted,

RHOADS & SINON LLP

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Attorneys for Defendants

CERTIFICATION OF CONCURRENCE

The undersigned hereby certifies that he has conferred with counsel for Plaintiff regarding the filing of the foregoing Motion for Partial Reconsideration of Motion for Extension of Dispositive Motion Deadline and Plaintiff's counsel CONCURS.

/s/ Dean F. Piermattei
Dean F. Piermattei

CERTIFICATE OF SERVICE

I hereby certify that on this 14th Day of June, 2007, a true and correct copy of the foregoing document was served by electronic means upon the following:

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/s/ Deborah L. McKinney